

COHEN & GREEN

November 30, 2022

Hon. Robert M. Levy, U.S.M.J.
United States District Court for the Eastern District of New York
225 Cadman Plaza East, Room 1227 South
Brooklyn, New York 11201

By Electronic Filing.

Re: Case No. 21-cv-04821, Cohen et al. v City of New York, et al.

Dear Judge Levy:

As the Court may recall, my firm, with co-counsel, represents the two plaintiffs in the case above. I write, jointly with Defendants, to ask the Court to extend the time it set to complete mediation.

By way of brief background, the Court referred this case to a pro bono mediation in an October 11, 2022 Minute Order, as part of a larger raft of cases our firm and the City are attempting to resolve, all arising out of the Black Lives Matter protests during the summer of 2020 (and beyond). In this case, the Hon. Steven M. Gold (Ret.) has graciously agreed to mediate this case, but calendars have made it so the first available date for everyone involved is January 31, 2023.

The parties and Judge Gold have scheduled a mediation session for January 31, so we would ask the Court to adjourn all deadlines set in the two October 11, 2022 Minute Orders (e.g., the *sine die* extension of discovery to the extent it is not automatically extended and the deadline for completing mediation) accordingly. Specifically, we would ask that the Court set a control date of February 10, 2023 to complete the mediation.

As always, everyone involved thanks the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN&GREEN P.L.L.C.

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cc:

All relevant parties by ECF.